

FILED
12/5/2023

AXK

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Dec 5, 2023

| | | |
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| UNITED STATES OF AMERICA |) | 1:23-cr-00622 |
| |) | Judge Sharon Johnson Coleman |
| |) | Magistrate Judge Sunil R. Harjani |
| v. |) | Cat. 2/RANDOM |
| |) | Violations: 18 U.S.C. § 1956(a)(1)(B)(i) |
| |) | and (h) |
| |) | |
| SUZANA VUKANAC |) | |

COUNT ONE

The SPECIAL NOVEMBER 2022 GRAND JURY charges:

1. At times relevant to the indictment:

a. SUZANA VUKANAC was a resident of the Northern District of Illinois.

b. Bank of America, BMO Harris Bank, Chase Bank, Citibank, and Fifth Third Bank were financial institutions with branches in multiple states.

2. Beginning no later than in or around June 2019, and continuing through and including in or around September 2020, in the Northern District of Illinois, and elsewhere,

SUZANA VUKANAC,

defendant herein, did knowingly conspire with one or more persons unknown to the Grand Jury, to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which transaction involved proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the property involved in

the transaction represented the proceeds of some form of unlawful activity, and that the transaction was designed, in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Manner and Means

3. It was part of the conspiracy that defendant SUZANA VUKANAC received and transferred over \$1 million of United States currency derived from schemes to defraud victims throughout the United States, including telemarketing and online schemes in which her coconspirators sold non-existent goods and falsely posed as romantic partners in need of money;

4. It was further part of the conspiracy that defendant's coconspirators fraudulently induced victims to wire transfer and mail large amounts of money to defendant SUZANA VUKANAC;

5. It was further part of the conspiracy that defendant SUZANA VUKANAC opened and controlled bank accounts at various financial institutions, including Bank of America, BMO Harris Bank, Chase Bank, Citibank, and Fifth Third Bank, in order to receive the fraudulent proceeds sent to her by wire transfer and other methods of electronic transfer;

6. It was further part of the conspiracy that defendant SUZANA VUKANAC withdrew money emanating from the victims of these schemes from her bank accounts in cash for the purpose of providing the money to her coconspirators;

7. It was further part of the conspiracy that defendant SUZANA VUKANAC used the cash withdrawn from her bank accounts and cash sent to her directly from victims of the telemarketing and online schemes by mail or interstate carrier to purchase over \$1 million in Bitcoin, and transferred the Bitcoin to wallets at the direction of her conspirators;

8. It was further part of the conspiracy that, to facilitate her receipt of fraud proceeds when questioned by bank employees regarding the nature and purpose of wire transfers sent by a victim of the fraud scheme to bank accounts that she controlled, defendant SUZANA VUKANAC falsely represented to bank employees that she had a personal relationship with the victim and knowingly misrepresented the purpose of the transfers;

9. It was further part of the conspiracy that defendant SUZANA VUKANAC and her coconspirators would and did perform acts and make statements to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT TWO

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.

2. On or about July 3, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the withdrawal of \$6,000 in cash from account number x4729 at Bank of America, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT THREE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.

2. On or about December 13, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the withdrawal of \$3,000 in cash from account number x6307 at Citibank, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT FOUR

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.

2. On or about January 15, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the withdrawal of \$2,500 in cash from account number x6307 at Citibank, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT FIVE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.

2. On or about January 16, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the withdrawal of \$2,500 in cash from account number x6307 at Citibank, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT SIX

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.

2. On or about January 17, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the withdrawal of \$4,200 in cash from account number x6307 at Citibank, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT SEVEN

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.

2. On or about January 17, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the withdrawal of \$800 in cash from account number x6307 at Citibank, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT EIGHT

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.

2. On or about February 7, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the withdrawal of \$5,000 in cash from account number x0198 at BMO Harris Bank, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT NINE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.
2. On or about March 3, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the withdrawal of \$5,000 in cash from account number x0198 at BMO Harris Bank, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT TEN

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.

2. On or about March 3, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the purchase of approximately \$5,000 in Bitcoin with cash, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT ELEVEN

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.

2. On or about June 28, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the purchase of approximately \$3,000 in Bitcoin with cash, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT TWELVE

The SPECIAL NOVEMBER 2022 GRAND JURY further charges:

1. The allegations set forth in paragraph 1 of Count One are incorporated here.

2. On or about August 4, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SUZANA VUKANAC,

defendant herein, knowingly conducted a financial transaction affecting interstate and foreign commerce, namely, the purchase of approximately \$5,140 in Bitcoin with cash, which financial transaction involved the proceeds of a specified unlawful activity, namely, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting such financial transaction, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY